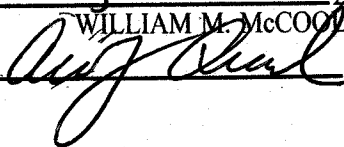


Presented to the Court by the foreman of the Grand Jury in open Court, in the presence of the Grand Jury and FILED in the U.S. DISTRICT COURT at Seattle, Washington.

July 25 2018
WILLIAM M. McCOOL, Clerk
By  Deputy

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

JESUS PALOMARES MENDEZ,

Defendant.

NO. **CR18-179 JLR**
INDICTMENT

The Grand Jury charges that:

COUNT 1

(Money Laundering)

Beginning on an unknown date before and continuing until on or about January 24, 2018, in Skagit County, within the Western District of Washington, California, and elsewhere, JESUS PALOMARES MENDEZ, and others known and unknown, did knowingly engage in and attempt to engage in, and aid and abet, a financial transaction, that is, the movement of approximately \$57,495 in United States currency from Washington to California, knowing that the funds involved in the transaction represented proceeds of some form of unlawful activity, and which funds in fact involved the proceeds of specified unlawful activity, that is, conspiracy to distribute controlled substances, in violation of Title 21, United States Code, Sections 841(a)(1) and 846, and did so:

1 (B) knowing that the transaction was designed in whole or in part –
2 (i) to conceal and disguise the nature, the location, the source, the
3 ownership, and the control of the proceeds of the specified unlawful activity; and
4 (ii) to avoid a transaction reporting requirement under State or federal law.
5 In violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i),
6 1956(a)(1)(B)(ii), and 2.

7 **ALLEGATION OF FORFEITURE**

8 The allegations contained in Count 1 of this Indictment are hereby realleged and
9 incorporated by reference herein for the purpose of alleging forfeiture pursuant to
10 Title 18, United States Code, Section 982(a)(1).

11 Pursuant to Title 18, United States Code, Section 982(a)(1), upon conviction of the
12 offense alleged in Count 1 of this Indictment, the defendant, JESUS PALOMARES
13 MENDEZ, shall forfeit to the United States any property, real or personal, involved in
14 such offense, and any property traceable to such property, including but not limited to the
15 following:

- 16 a. Approximately \$57,495 in U.S. currency, seized from a black, 2011
17 Volkswagen, bearing license plate BBR6671, on or about January 24, 2018;
18 and
19 b. A judgment for a sum of money representing any property involved in the
20 offense charged in Count 1, and any property traceable to such property.

21
22 **Substitute Assets**

23 If any of the above-described forfeitable property, as a result of any act or
24 omission of the defendant:

- 25 a. cannot be located upon the exercise of due diligence;
26 b. has been transferred or sold to, or deposited with, a third party;
27 c. has been placed beyond the jurisdiction of the Court;
28 d. has been substantially diminished in value; or

1 e. has been commingled with other property which cannot be divided
2 without difficulty;
3 it is the intent of the United States, pursuant to Title 18, United States Code, Section
4 982(b) and Title 21, United States Code, Section 853(p), to seek the forfeiture of any
5 other property of the defendant up to the value of the above-described forfeitable
6 property.

8 A TRUE BILL:

9 DATED: 7-25-2018

10 *Signature redacted per policy*

11 FOREPERSON

12
13
14 
15 ANNETTE L. HAYES
16 United States Attorney

17 
18 SARAH Y. VOGEL
19 Assistant United States Attorney

20 
21 S. KATE VAUGHAN
22 Assistant United States Attorney

23 
24 NICHOLAS MANHEIM
25 Assistant United States Attorney